

October 6, 1999

MEMORANDUM

TO: Section Chiefs
DAQ Regional Supervisors

FROM: Alan Klimek

SUBJECT: NC DAQ Procedure to Quantify Condensible Particulate Matter

The Division of Air Quality, based on the recommendations of the Technical Services Section, will require all sources performing particulate matter sampling* to also measure condensible particulate emissions. The data will be used for emission inventories, permit classifications, and fees. There will be a transitional period for determinations of compliance with Prevention of Significant Deterioration (PSD) and the North Carolina particulate standards when including condensible particulate emissions. The transitional period for specific source categories will be set following the procedures defined in the 10/26/98 policy "*Guidance on Permitting and Enforcement Decisions when Earlier Decisions are Rendered Incorrect by New Information.*"

During the transitional period, the DAQ will acquire a sufficient body of data that can characterize condensible particulate emissions from source categories. The DAQ will continue to require condensible particulate measurements from source categories that emit condensibles, and delete the requirement for source categories that do not emit condensible particulate matter.

NSPS sources are exempt from numerically including condensible emissions with filterable particulate when determining compliance with the NSPS standard. However, the NSPS sources will still need to quantify and report condensible emissions for permit classifications, emission inventories, fees, and PSD.

The new National Ambient Air Quality Standard for PM_{2.5} compels the DAQ to compile data on source level emissions of condensible particulate matter. Also, based on the recent policy determination by the Central Office Permitting Section, all NSPS sources are also subject to the 15A NCAC 2D .0500 rules for particulate matter, which shall include condensible particulate emissions with filterable particulate emissions. (John Evans memo to the Permits Workgroup dated 3/19/99.)

9/15/99

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The Stationary Source Compliance Branch (SSCB) defined several regulatory options as a result of their investigation into the subject of condensible particulate matter (memo to Alan Klimek 8/16/99 and in the report Condensible Particulate Matter: Regulatory History and Proposed Policy: 1/27/98 DAQ SSCB). The Division of Air Quality has the authority to require the measurement of condensible particulate emissions via 15A NCAC 2D .0501. The Division has used this authority in the past and this policy will provide uniformity in the application of the testing requirement.

Regional Offices and Central Office Permitting staff shall implement this policy in all new permits. Compliance staff in the regions and the central office shall implement this policy during the test plan approval process.

* EPA Method 5 is located in 40 CFR 60 Appendix A and is the most commonly used "filterable" particulate matter test method. Method 202 is located in 40 CFR 51 Appendix M and is the condensible particulate matter test method. Method 5 and Method 202 analyses are performed on the particulate matter catch from the same sampling system. Method 202 does not require more field sampling activity, but it does require field sample preparation and laboratory work. There are other "filterable" particulate matter methods such as EPA Method 17, and the PM10 test - Method 201. This policy will require the measurement of condensibles whenever particulate matter is measured, regardless of the exact "filterable" particulate method.